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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(HONORABLE DANA M. SABRAW)

UNITED STATES OF AMERICA, Plaintiff, v. EMAD SALAHSHOOR, Defendant.	Case No. 08CR0101-DMS DATE: March 14, 2008 TIME: 11:00 a.m. NOTICE OF MOTIONS AND MOTIONS TO: 1) PRESERVE EVIDENCE AND COMPEL DISCOVERY; AND 2) GRANT LEAVE TO FILE FURTHER MOTIONS

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY; AND
MARC CONOVER, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that, on March 14, 2008 at 11:00 a.m., or as soon thereafter as counsel may be heard, defendant Emad Salahshoor, by and through his attorneys, Shaffy Moeel and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the following motions.

MOTIONS

Defendant Emad Salahshoor, by and through his attorneys, Shaffy Moeel and Federal Defenders of San Diego, Inc., moves this Court pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law, and local rules for an order:

1) Preserving Evidence and Compelling Production of Discovery;

2) Granting Leave to File Further Motions.

This motion is based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing of these motions.

Respectfully submitted,

DATED: March 7, 2008

/s/ Shaffy Moeel
SHAFFY MOEEL
Federal Defenders of San Diego, Inc.
Attorneys for Mr. Salahshoor